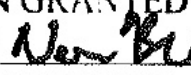


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JOHN ELEFTERAKIS*
NICHOLAS ELEFTERAKIS
RAYMOND PANEK

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 11/20/2019

OLIVER R. TOBIAS
JEFFREY B. BROMFELD
FAIZAN GHAZNAVI
GABRIEL P. HARVIS
BAREE N. FETT
STEPHEN KAHN
EVAN M. LA PENNA

BY ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

The post-discovery conference scheduled for
February 7, 2020 is adjourned to April 3,
2020 at 10:30 a.m.

KRISTEN PERRY – CONIGLIARO
AIKA DANAYEVA
ARIANA ELEFTERAKIS
MICHAEL INDELICATO
MICHAEL MARRON
DOMINICK MINGIONE
JOSEPH PERRY
MARIE LOUISE PRIOLO *
KEYONTE SUTHERLAND
DANIEL SOLINSKY
ANDREW VILLA

Re: *Jacobs, et al. v. City of New York, et al.*, 18 CV 3275 (VSB)

Your Honor:

*Also Admitted In New Jersey

I, along with Gabriel Harvis and Jeffrey Rothman, represent plaintiffs in the above-referenced action. I write to respectfully request an adjournment of the existing discovery deadline from January 17, 2020 to March 31, 2020, along with a corresponding adjournment of the Post-Discovery Conference, to a date and time convenient to the Court after the close of discovery. Defendants join in this application. This is the third application for an extension of the discovery deadline.

The parties respectfully request additional time to complete discovery for several reasons. The undersigned, along with my partner Gabriel Harvis and defense counsel, were the attorneys handling the wrongful conviction matter, *Hamilton v. City of New York*, 15 CV 4574 (CBA) (SJB), pending in the Eastern District of New York. The *Hamilton* trial was scheduled to commence on November 12, 2019, and counsel for the parties in this matter had been preparing for the trial - which was expected to continue for approximately three weeks - until recently when a settlement agreement was reached. In light of the extensive trial preparation, the parties were not able to complete the voluminous document discovery in this case necessary to begin depositions. To date, thousands of documents have been produced and the parties are working diligently and cooperatively to complete document production and review so that depositions may begin apace. We believe that given the additional requested time, the parties would be in a position to complete all discovery by March 31st.

Hon. Vernon S. Broderick

Nov. 19, 2019

Accordingly, the parties respectfully request that the discovery deadline be adjourned to March 31, 2020. Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Baree N. Fett', with a stylized flourish at the end.

Baree N. Fett

cc: All Counsel